



April 9, 1991

Mr. Don Ostler, Executive Secretary
Utah Bureau of Water Pollution Control
288 North 1460 West
P.O. Box 16690
Salt Lake City, UT 84116-0690

Reference: Repairing the Barren Solution Pond

Dear Mr. Ostler:

Enclosed please review our plans for repairing and upgrading barren solution pond. As we have already replaced the FML in the process pond, we would intend to upgrade this pond in conjunction with its planned expansion. We would like to clarify two issues in your April 9, 1991 letter.

Comment #1. Be advised that there have been two primary FML liners in the bottom of the process water pond since August 1990. The second pond bottom liner was placed in response to numerous pin-hole leaks that developed in the original FML while we were performing a pond clean-out. This "floating" observed by Lyle was the result of water entering the damaged upper FML and being trapped by the lower FML. In order to drain this, we perforated the upper FML and pumped the solution that remained in-between the FML's. Also note that the residual water in the leak detection sump can be pumped only by a hand pump as there is insufficient volume to fill the suction line to allow for mechanical pumping.

It has been our experience with the process water pond that leakage from small pinholes to 1/32-inch evidence themselves rapidly to our leak detection sump. Our experience as well as our ability to pump water from the leak detection sumps in both the barren and process water pond after the flyrock incident demonstrates the current leak detection system is sensitive to leakage.

Comment #2. Further discussions with Mr. Stott on April 9, 1991 confirmed that at this time, the FML to the barren and process pond will require replacement. The preg pond will be inspected at a later date to confirm its integrity.

REPAIR PLANS

I. Barren Solution Pond:

This repair will involve five steps: (please see Figure 1).

1. A suction line will be extended from the existing barrens holding tank to the barrens pond pump. This will isolate the barren pond and remove any inflow.

2. The majority of the barren pond will be pumped to ponds 1 and 2. Sludge build up will be cleaned and loaded into barrels and emptied and spread on leach pad 2. The remaining water will be transferred to the process water pond.

3. The exposed FML will be laid open at the leak detection sump and in four locations for clay sampling and inspection of the leak detection system. At the leak detection sump, the existing gravel bed and well screen pipe will be removed, and the sump lined with 60 mil HDPE.

4. Next, a filter fabric, sand, and pea gravel drain net will be placed in the lined sump. A six-inch HDPE pipe with a well screen will be placed into the drain net and run upslope to the pond edge. Filter fabric and welded HDPE straps will cushion and restrain the pipe from moving.

5. A geonet will be placed and secured over the lower FML. Finally, the 80-mil upper FML will be installed.

II. Process Solution Pond:

This pond will be inspected and repaired in the fashion described above. This repair will occur in conjunction with the process pond expansion.

III. Pregnant Solution Pond:

This pond will be inspected when solution levels can be lowered and an inspection can be adequately performed.

We request the Bureau to modify the leak detection criteria and adopt this upgraded system to a leachate recovery system. Please confirm with us by letter

acceptable recovery rates for the system and any other related requirements.

Finally, we would also request the Bureau to allow Tenneco Minerals to proceed with the process pond expansion. This will ultimately speed the process solution pond upgrade.

Sincerely,

TENNECO MINERALS COMPANY



Ken A. Kluksdahl
Mine Manager

KAK:bas

Tenneco Minerals
A Tenneco Company

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 12, 1991

Mr. Don Ostler
Executive Secretary
Utah Water Pollution Control Committee
288 North 1460 West
P.O. Box 16690
Salt Lake City, Utah 84116-0690

Re: Notice of Violations and Order
Docket No. I91-03
Request for Hearing

Dear Mr. Ostler:

As indicated in our prior letters to you, Tenneco Minerals is actively and fully responding to the action items in the Notice and Order and hopes that this matter can be resolved without the need for any administrative hearing or proceedings. The purpose of this letter is to preserve Tenneco Minerals' right to a hearing in the event the matter is not resolved through negotiation.

In accordance with UCA 26-11-12 and 63-46b-3, Tenneco Minerals hereby requests a hearing before the Committee to contest the Notice and Order on the grounds that no violation occurred, that operations were conducted in accordance with approved permits, and that any discharge or exceedance of limitations or standards was due to conditions or circumstances beyond Tenneco Minerals' control. We hereby reserve the right, in the event a hearing is needed, to submit a more exhaustive statement of reasons responding to the Notice and Order and alleging these and other grounds. In connection with any such hearing, Tenneco Minerals would request that the Notice and Order be dismissed and that no civil penalties be assessed in connection therewith.

Very truly yours,

TENNECO MINERALS COMPANY

A handwritten signature in dark ink, appearing to read "Ray Johnson", written over the company name.

Ray L. Johnson *MLK*
Vice President

RLJ/MLK/ssm

cc:

K. Kluksdahl
D. Brannum
M. Keller - Van Cott, Bagley
B. Buck - JBR Consultants
G. Toland